



Solutia Inc.  
702 Clydesdale Avenue  
Anniston, Alabama 36201 USA  
+1.256.231.8400 phone  
+1.256.231.8553 phone  
www.solutia.com

September 9, 2013

SENT VIA FEDERAL EXPRESS

Ms. Pamela J. Langston Scully, P.E.  
Remedial Project Manager  
United States Environmental Protection Agency, Region IV  
Atlanta Federal Center  
61 Forsyth St.  
Atlanta, GA 30303-8960

**RE: August 2013 Progress Report  
Anniston PCB Site (Docket No. 1:02-cv-0749-KOB)  
Anniston, Alabama**

Dear Ms. Langston Scully:

Please find enclosed five (5) hard copies and five (5) electronic copies of the August 2013 Progress Report for the Partial Consent Decree between Solutia Inc., Pharmacia LLC (collectively P/S) and the United States Environmental Protection Agency (EPA) entered by the United States District Court for the Northern District of Alabama (Court) on August 4, 2003 and the Consent Decree for Remedial Design/Remedial Action for Operable Unit No. 3 between P/S and the EPA entered by the Court on April 17, 2013. This report describes the work performed, unanticipated issues encountered, and analytical data received during the reporting period of August 1, 2013 through August 31, 2013. The report also describes upcoming developments anticipated for the months of September and October 2013.

If you should have any questions concerning this matter or need additional information, please call me at (256) 231-8404.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Gayle Macolly", written over a horizontal line.

E. Gayle Macolly  
Manager, Remedial Projects  
Solutia Inc.

Attachments

cc: Mr. Chip Crockett (ADEM)  
Mr. G. Douglas Jones, Esq.  
Mr. Thomas Dahl



**AUGUST 2013 PROGRESS REPORT**

**ANNISTON PCB SITE**

**(DOCKET NO. 1:02-cv-0749-KOB)**

**ANNISTON, ALABAMA**

USEPA I.D. No. ALD 004 019 048

Submitted For:

**Solutia Inc. and Pharmacia LLC**

**702 Clydesdale Avenue**

**Anniston, Alabama 36201**

September 9, 2013

## TABLE OF CONTENTS

<u>SECTION</u>	<u>PAGE</u>
1.0 INTRODUCTION.....	1
1.1 2003 PARTIAL CONSENT DECREE.....	1
1.2 2013 OPERABLE UNIT 3 (OU-3) REMEDIAL DESIGN/REMEDIAL ACTION CONSENT DECREE.....	1
2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD .....	3
2.1 GENERAL 2003 CD ACTIVITIES .....	3
2.1.1 Administrative Submittals .....	3
2.2 OPERABLE UNIT 1/OPERABLE UNIT 2 (OU-1/OU-2) RESIDENTIAL PROGRAM.....	3
2.2.1 General.....	3
2.2.2 Residential Surface Sampling Program .....	4
2.2.2.1 Residential Sampling Access.....	4
2.2.2.2 Residential Sampling Activities .....	4
2.2.3 Residential Removal Properties Program .....	4
2.2.3.1 Residential Removal Access .....	4
2.2.3.2 Residential Removal Activities .....	5
2.3 OU-1/OU-2 NON-RESIDENTIAL PROGRAM .....	5
2.4 11 <sup>TH</sup> STREET DITCH .....	6
2.5 OPERABLE UNIT 4 (OU-4) .....	6
2.5.1 OU-4 Residential Surface Sampling Program .....	8
2.5.1.1 OU-4 Residential Sampling Access .....	8
2.5.1.2 OU-4 Residential Sampling Activities .....	8
2.5.2 OU-4 Residential Removal Properties Program .....	8
2.5.2.1 OU-4 Residential Removal Access .....	8
2.5.2.2 OU-4 Residential Removal Activities .....	8
2.6 INTERIM MEASURES .....	8
2.7 TECHNICAL ASSISTANCE PLAN GRANT (TAPG).....	10
2.8 COMMUNITY ADVISORY GROUP (CAG).....	10
2.9 ANNISTON COMMUNITY EDUCATION FOUNDATION (ACEF).....	10

3.0	OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD.....	11
3.1	GENERAL OU-3 RD/RA CD ACTIVITIES.....	11
3.1.1	Administrative Submittals .....	11
3.2	REMEDIAL DESIGN .....	11
4.0	WORK SCHEDULED .....	12
4.1	2003 CD WORK ACTIVITIES .....	12
4.2	OU-3 RD/RA CD WORK ACTIVITIES .....	13

## TABLES

Table 1 – Partial Consent Decree Submittal Schedule

Table 2 – OU-1 Residential Program Summary

Table 3 – Property Status for Residential Properties with Greater Than 1 ppm PCBs Results for Surface Composite Samples in Evaluation Areas 1 – 35

Table 4 – Property Status for Residential Properties with Greater than 1 ppm PCBs and Less than 400 ppm Lead Results for Surface Composite Samples in Zone A

Table 5 – Property Status for Residential Properties with Greater than 1 ppm PCBs and Less than 400 ppm Lead Results for Surface Composite Samples in Zone B

Table 6 – OU-4 Residential Program Summary

Table 7 – Property Status for Residential Properties with Greater Than 1 ppm PCBs Results for Surface Composite Samples in OU-4

Table 8 – Former Holiday Inn Project Borrow Source Data

Table 9 – OU-3 Consent Decree Submittal Schedule

## **1.0 INTRODUCTION**

### **1.1 2003 Partial Consent Decree**

This monthly progress report has been prepared in accordance with the requirements of the 2003 Partial Consent Decree (2003 CD) between the United States Environmental Protection Agency (EPA), Solutia Inc. (Solutia), and Pharmacia LLC (Pharmacia) entered by the United States District Court for the Northern District of Alabama (the Court) on August 4, 2003 (Docket No. 1:02-cv-0749-KOB). The 2003 CD was issued under Sections 106, 107, and 113(g)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §§9606, 9697, §9613(g)(2). The 2003 CD provides for the performance of studies and response work by Solutia and Pharmacia at the Anniston PCB Site (Site) as defined by the 2003 CD. Solutia and Pharmacia, with Monsanto performing work on behalf of Pharmacia, are referred to as "P/S" in the subsequent sections of this report.

In accordance with Appendix A Section XIII (47), Appendix B Task 2, and Appendix G Section VI (2.5) of the 2003 CD, Section 2.0 of this report describes the work performed during the period of August 1, 2013 through August 31, 2013, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 4.1 of this report also describes upcoming developments anticipated over the next two months for the work required by the 2003 CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

### **1.2 2013 Operable Unit 3 (OU-3) Remedial Design/Remedial Action Consent Decree**

The Consent Decree for the Remedial Design/Remedial Action for Operable Unit 3 (OU-3 RD/RA CD) between the EPA and P/S was entered by the Court on April 17, 2013 (Docket No. 1:02-cv-0749-KOB). The OU-3 RD/RA CD, which encompasses the Solutia plant and the adjacent closed South and West Landfills, provides for the implementation of the remedies selected for OU-3 as described in the Interim Record of Decision (IROD) issued by Region 4 of the EPA on September 29, 2011.

In accordance with Section X. Paragraph 31 of the OU-3 RD/RA CD, Section 3.0 of this report describes the work performed for the OU-3 RD/RA during the period of August 1, 2013 through

August 31, 2013, including actions taken, unanticipated issues, if applicable, and analytical data received during the reporting period. Section 4.2 of this report describes the upcoming developments anticipated over the next two months for the work that will be required by the OU-3 RD/RA CD, including scheduled dates of actions to be performed and planned resolutions of past or anticipated problems, if applicable.

## **2.0 2003 CD WORK PERFORMED DURING REPORTING PERIOD**

### **2.1 General 2003 CD Activities**

#### **2.1.1 Administrative Submittals**

A 2003 CD submittal schedule for the Site that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 1. This schedule includes the dates that documents were submitted to the EPA and the dates that approvals or comments were received from the EPA.

### **2.2 Operable Unit 1/Operable Unit 2 (OU-1/OU-2) Residential Program**

#### **2.2.1 General**

The residential program consists of residential work associated with the 2003 CD. This includes the non-time critical (NTC) residential activities as well as time critical residential activities associated with the Administrative Order on Consent (AOC), effective October 5, 2001.

On April 26, 2011, P/S submitted the NTC Removal Action Amended Supplemental Sampling and Analysis Plan, Revision 1.0 (Amended SSAP, Rev. 1.0), recommending no additional sampling in Zone B and responding to previous comments provided by the EPA. The EPA submitted comments to the Amended SSAP, Rev. 1.0 on May 16, 2013. P/S submitted responses to those comments to the EPA on June 28, 2013. EPA approval is pending.

On July 31, 2012, P/S submitted the NTC Removal Action Completion Report for the Residential Properties in OU-1/OU-2 (NTC Completion Report). The EPA submitted comments to the NTC Completion Report on May 16, 2013. P/S are currently preparing responses to those comments.

P/S continued to implement the approved NTC Removal Action Interim Institutional Control (IC) Program for Residential properties during this reporting period.

A summary of the residential program is presented in Table 2.

## **2.2.2 Residential Surface Sampling Program**

### **2.2.2.1 Residential Sampling Access**

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. There were no residential properties that had access activity performed by P/S and/or access acquisition by the EPA during this reporting period.

### **2.2.2.2 Residential Sampling Activities**

During this reporting period, P/S did not perform any composite surface soil sampling.

## **2.2.3 Residential Removal Properties Program**

### **2.2.3.1 Residential Removal Access**

Access activities include updating owner/tenant information and/or access request information and notifying the EPA of owner/tenant noncompliance with access requests. There were no residential removal properties that had access activity performed by P/S and/or access acquisition by the EPA during this reporting period.

Currently in Evaluation Areas 1 through 35, 17 residential properties have surface composite samples with PCB results greater than or equal to 1 ppm that require a removal action. The description of each property's status is presented in Table 3.

Currently in Zone A, two residential properties previously sampled by the EPA and/or Foothills have surface composite samples with PCB results greater than or equal to 1 ppm and lead results less than 400 ppm and will require a removal action. The description of each property's status is presented in Table 4.

Currently in Zone B, three residential properties previously sampled by the EPA and/or Foothills have surface composite samples with PCB results greater than or equal to 1 ppm and lead results less than 400 ppm and will require a removal action. The description of each property's status is presented in Table 5.



#### **2.2.3.2 Residential Removal Activities**

During this reporting period, P/S did not perform any surface or depth sampling associated with residential removal properties in Evaluation Areas 1 through 35 and Zones A and B.

P/S continued to perform the required routine inspections of the Central Staging and Soil Management Area (CSSMA) and South Staging Soil Management Area (SSSMA) during this reporting period. No adverse findings were noted during the inspections.

P/S identified three contiguous properties located at 510 Legrande Street, 0 Ashley Street (Tax ID 11-22-01-12-03-1-36, PPIN # 32325), and 505 Ashley Street that met the criteria for an alternative response action as defined in Section II, 7 of the Stipulation and Agreement. An Alternative Removal Action Work Plan was submitted on July 3, 2013 and is currently pending approval from the EPA.

#### **2.3 OU-1/OU-2 Non-Residential Program**

The Preliminary Site Characterization Summary Report (PSCSR) for OU-1/OU-2 was submitted to the EPA on December 18, 2007. The EPA had previously deferred approval, contingent upon approval of additional groundwater investigation work. This work was completed, and on November 15, 2012, the EPA approved both the PSCSR for OU-1/OU-2 and the Third Non-Residential Groundwater Investigation Report for OU-1/OU-2. Additionally on November 15, 2012, the EPA released the Final Human Health Risk Assessment (HHRA) for OU-1/OU-2, along with a supplemental analysis of dioxin impacts to address concerns as a result of the Dioxin Reassessment. With the approval of these reports and the release of the HHRA, the Remedial Investigation (RI) Report for OU-1/OU-2 was submitted to the EPA on February 18, 2013. In addition, the Streamlined Ecological Risk Assessment (SERA) for Snow Creek, as outlined in the approved OU-1/OU-2 Proposed Revisions to the RI/FS Work Plan Milestone Schedule, was submitted to EPA on February 12, 2013. On February 27, 2013, P/S met with the EPA and representatives from the Alabama Department of Environmental Management to review the EPA's initial comments on the RI Report for OU-1/OU-2 and the SERA for Snow Creek. On April 23, 2013, the EPA submitted comments to the SERA for Snow Creek. On May 15, 2013, the ecological risk assessors from P/S and EPA met to discuss the proposed document revisions in response to the EPA's comments. On May 16, 2013, P/S submitted a letter to the EPA

documenting a revised submittal schedule for the revisions to the SERA for Snow Creek that was agreed to by P/S, the EPA and the Technical Special Master. Consistent with the revised schedule, the revised SERA for Snow Creek was submitted to the EPA on June 5, 2013. EPA approval is pending.

On May 20, 2013, the EPA submitted comments to the RI Report for OU-1/OU-2 with P/S responses due to the EPA by June 19, 2013. On June 13, 2013, P/S requested an extension to submit the revised RI Report for OU-1/OU-2 by June 28, 2013. On June 14, 2013, the EPA, with the concurrence of the Technical Special Master, approved the schedule extension. On June 27, 2013, P/S submitted the Revised RI Report for OU-1/OU-2. EPA approval is pending.

On August 21, 2013, P/S met with the EPA and the Technical Special Master to review the EPA's initial comments to the Revised RI Report for OU-1/OU-2 and the Revised SERA for Snow Creek, and to begin the advance planning process for the Feasibility Study. P/S will submit a revised RI Report and a revised SERA for Snow Creek within thirty days of receiving formal comments from the EPA.

With the approval of the Third Non-Residential Groundwater Investigation Report for OU-1/OU-2, on April 4, 2013, P/S requested to abandon six of the temporary wells (T-08, T-12, T-13, T-14, T-15 and T-17) that were installed as part of the OU-1/OU-2 Non-Residential Groundwater Investigation. The EPA approved the well abandonment request on April 9, 2013. P/S completed the well abandonment work from June 11 to June 13, 2013, and the final report documenting the well abandonment activities was submitted to the EPA on August 14, 2013.

#### **2.4 11<sup>th</sup> Street Ditch**

P/S will perform the next quarterly inspection as described in the 11<sup>th</sup> Street Ditch Operations and Maintenance Plan in the month of September 2013.

#### **2.5 Operable Unit 4 (OU-4)**

Revision No. 2 of the Phase 2 Field Sampling Plan for Operable Unit 4 (OU-4 Phase 2 FSP) was submitted to the EPA for approval on April 28, 2010, including the final Sediment Toxicity Testing Plan. Final EPA approval of the OU-4 Phase 2 FSP was received on April 29, 2010. All

of the field investigations identified in the OU-4 Phase 2 FSP with the exception of the sediment toxicity testing program were implemented based on the EPA's prior approval of Revisions Nos. 0 and 1 to the OU-4 Phase 2 FSP.

Phase 1a of the sediment toxicity and bioaccumulation testing program conducted by the United States Geological Survey (USGS) and the United States Army Corps of Engineers (USACE) was completed in December 2010. Phase 1b of the sediment toxicity and bioaccumulation testing program began in mid-January 2011, and the laboratory portion of the work was completed in late April 2011. All of the chemical characterization data for the sediment samples used during Phase 1a and Phase 1b of the sediment toxicity and bioaccumulation testing program have been reported. The sediment toxicity laboratories submitted a draft version of the laboratory report presenting the sediment toxicity and bioaccumulation data on February 29, 2012. Following the peer review process, the laboratories submitted the pre-final report to P/S on December 20, 2012. P/S submitted comments to the laboratories on January 17, 2013. The laboratories submitted their responses to P/S' comments on February 27, 2013. On April 12, 2013, P/S submitted final responses to the laboratories for their consideration in finalizing the report. The USGS/USACE are slated to release the final report following the P/S's retrieval of excess OU-4 sediment from the USGS/USACE facilities. These sediments are no longer needed by the USGS/USACE as the testing phase of the toxicity and bioaccumulation program is complete. The excess OU-4 sediments were retrieved from the USGS and USACE facilities by representatives of P/S on July 15, and July 16, 2013, respectively, and will be disposed at an appropriated permitted facility. The final report is expected in the September/October 2013 timeframe.

The OU-4 Phase 3 FSP was submitted to the EPA on October 15, 2010 and approved by the EPA on February 23, 2011. The site characterization portion of the work including the supplemental sampling and analysis of soil and sediment under Addendum No. 1 and Addendum No. 2 has been completed. All of the associated analytical chemistry results have been reported to the EPA. The OU-4 Phase 3 FSP also included an evaluation of potential current residential use areas. The EPA approved the subsequently submitted OU-4 Residential Property Field Sampling Plan and the performance of required removal actions under the NTC Removal Agreement.

A summary of the OU-4 residential program is presented in Table 6.

## **2.5.1 OU-4 Residential Surface Sampling Program**

### **2.5.1.1 OU-4 Residential Sampling Access**

Access activity includes updating owner/tenant information, access request information, and/or EPA notification of non-compliance information. There were no OU-4 residential properties that had access activity performed by P/S and/or access acquisition by the EPA during this reporting period.

### **2.5.1.2 OU-4 Residential Sampling Activities**

During this reporting period, P/S did not perform any composite surface soil sampling for OU-4 residential properties.

## **2.5.2 OU-4 Residential Removal Properties Program**

### **2.5.2.1 OU-4 Residential Removal Access**

Access activities include updating owner/tenant information and/or access request information and notifying the EPA of owner/tenant noncompliance with access requests. There were no OU-4 residential properties that had access activity performed by P/S and/or access acquisition by the EPA during this reporting period.

Currently in OU-4, one residential property has surface composite samples with PCB results greater than or equal to 1 ppm and requires a removal action. The description of this property's status is presented in Table 7.

### **2.5.2.2 OU-4 Residential Removal Activities**

During this reporting period, P/S did not perform surface or depth sampling or removal activities associated with residential removal properties in OU-4.

## **2.6 Interim Measures**

On September 29, 2010, P/S submitted a Scope of Work to the EPA describing proposed support activities for the Alabama Department of Transportation (ALDOT) Interstate 20 (I-20) Bridge Expansion Project over Snow Creek. The EPA approved the Work Plan on October 1, 2010.

This work, which includes excavation and capping of areas affected by ALDOT's proposed bridge replacement and widening of I-20 over Snow Creek, began in early November 2010 and was substantially completed in April 2013. Right-of-way fence and lighting remain to be installed and are expected to be completed in late 2013.

On March 29, 2013, P/S submitted a proposed sampling plan for the redevelopment of the former Holiday Inn property located at 601 Hamric Drive in Oxford, Alabama. The EPA approved the sampling plan on April 9, 2013 with the condition that ten percent of the field screened samples be submitted for confirmatory laboratory analysis. The sampling was performed during the week of April 22, 2013, and the data were previously reported in the July 2013 progress report. On August 8, 2013, P/S submitted the Former Holiday Redevelopment Support Work Plan (Support Work Plan). On August 15, 2013, P/S held a conference call to discuss the Support Work Plan with the EPA and the Technical Special Master, and followed up with a clarification email. On August 16, 2013, the EPA approved the Support Work Plan. The support work for the redevelopment of the Former Holiday Inn commenced the week of August 26, 2013 and is expected to continue through the fall of 2013.

On July 18, 2013, P/S sampled a potential borrow source located at 0 North of Friendship Road in Oxford Alabama (PPIN # 65698) to evaluate the suitability of this borrow source to support construction activities related to the Former Holiday Inn Redevelopment Site. P/S submitted the results of the sampling event to the EPA on August 14, 2013, and the EPA approved the use of this borrow source on August 26, 2013. Table 8 includes a summary of the data collected at this borrow source.

On June 4, 2013, P/S submitted a proposed sampling plan for the Colonial Pipeline Company Recoating Project located within the 100-year floodplain of Choccolocco Creek near Oxford, Alabama. The EPA approved the sampling plan with comments on June 10, 2013. The sampling was performed during the week of June 24, 2013, and the data were previously reported in the July 2013 progress report. P/S is currently preparing a summary report and support work plan for submittal to the EPA.

## **2.7 Technical Assistance Plan Grant (TAPG)**

The Technical Advisor (TA), Mr. Bertrand Thomas, P.G., with the assistance of Mr. Jerel Harris, continues to review Site-related documents and convey information from these documents to the Community Advisory Group (CAG) and the community. Mr. Thomas' reports are posted on the West Anniston Foundation's web site.

On August 29, 2013, the West Anniston Foundation held a community education forum on the PCB clean-up activities in OU-1/OU-2 for the Anniston PCB Site. The forum was facilitated by the TA.

## **2.8 Community Advisory Group (CAG)**

There was no CAG meeting scheduled for August. The next CAG meeting is scheduled for September 23, 2013.

## **2.9 Anniston Community Education Foundation (ACEF)**

The ACEF continues to collaborate with community leaders, parents, educational foundations, religious entities, public schools and other civic organizations to assist in the process of improving the quality of education for children in the community.

### **3.0 OU-3 RD/RA CD WORK PERFORMED DURING REPORTING PERIOD**

#### **3.1 General OU-3 RD/RA CD Activities**

A CD submittal schedule for OU-3 that includes this reporting period's submittals and/or submittals awaiting approval or response is included as Table 9.

##### **3.1.1 Administrative Submittals**

P/S submitted a draft deed notice to the EPA on April 30, 2013 that included an updated description of OU-3 to be filed with Calhoun County land records. On June 28, 2013, P/S submitted a letter to the EPA requesting to omit from the OU-3 boundary a 0.209-acre commercial parcel located northeast of the Solutia Plant (PPIN # 32038). This parcel was included within the boundaries of OU-3, but was never part of the plant site operations.

On August 28, 2013, P/S submitted a revised draft deed notice along with Revision 1 of the OU-3 Remedial Design Work Plan (RD Work Plan). The revised draft deed notice excluded the 0.209-acre commercial parcel. EPA approval is pending.

#### **3.2 Remedial Design**

P/S submitted the OU-3 RD Work Plan to the EPA on April 30, 2013. In accordance with the requirements of the OU-3 RD/RA CD, the RD Work Plan includes the OU-3 Sampling and Analysis/Quality Assurance Project Plan (SA/QAPP), and a draft Institutional Control Implementation and Assurance Plan (ICIAP). In addition to the RD Work Plan, P/S also submitted the OU-3 RD Health and Safety Plan (HASP) to the EPA on April 30, 2013. On May 16, 2013, P/S hosted a conference call to present the OU-3 RD Work Plan and its companion documents to the EPA. The EPA provided comments to the RD Work Plan, the SA/QAPP and the ICIAP on July 29, 2013. On August 28, 2013, P/S submitted responses to the EPA's comments along with Revision 1 of the RD Work Plan, the SA/QAPP and the Draft ICIAP. EPA approval is pending.

## **4.0 WORK SCHEDULED**

### **4.1 2003 CD Work Activities**

During the months of September and October 2013, the following work elements are anticipated:

- Obtain and/or process access for performing residential sampling activities in OU-1/OU-2 and OU-4 according to the Supplemental Sampling and Analysis Plan (SSAP) and the Addendum to the NTC Removal Action Work Plans for the Site (as necessary);
- Perform surface, depth, indoor dust and/or crawl space sampling of residential properties in OU-1/OU-2 and OU-4 as access is provided (as necessary);
- Perform removal actions for residential properties in OU-1/OU-2 and OU-4 as access is provided (as necessary);
- Address action items identified by P/S, the EPA and/or the property owner/tenant for completed removal response properties (as necessary);
- Complete the annual field surveys in accordance with the Interim IC Program for residential properties in OU-1/OU-2;
- Perform CSSMA and SSSMA inspection and maintenance requirements in accordance with the approved CSSMA Operating and Closure Plan, the approved SSSMA Operating and Closure Plan, and the SSSMA Interim Operations and Maintenance Plan;
- Perform 11<sup>th</sup> Street Ditch inspection and maintenance requirements in accordance with approved schedule;
- Prepare and submit the OU-4 Preliminary Site Characterization Summary Report;
- Continue to implement I-20 Snow Creek Bridge Expansion Project Support Work Plan;
- Continue to implement the Former Holiday Inn Redevelopment Support Work Plan;
- Prepare and submit a summary report for the Colonial Pipeline Company Recoating Project Sampling Plan results and develop a support plan to address the PCB-impacted areas;
- Respond to EPA comments, as necessary, on deliverables submitted to the EPA for approval;
- ACEF will continue to hold board meetings; and
- The CAG will hold a regularly scheduled meeting on September 23, 2013.



#### **4.2 OU-3 RD/RA CD Work Activities**

During the months of September and October 2013, the following work elements are anticipated:

- Record the approved updated deed notice for OU-3, and provide EPA with a certified copy of the recorded notice within ten days of recording; and
- Commence Remedial Design activities.

## Tables

**TABLE 1**  
**PARTIAL CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

**Administrative Issues**

**Reports**

Central Staging and Soil Management Area (Former Miller Property) Final Closure Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	July 11, 2006
Temporary Staging and Loading Area Completion Report <sup>(1)</sup>	Submitted to EPA <b>Approval Pending</b>	January 11, 2007
Updated Interim Operations and Maintenance Plan (2012) - South Staging and Soil Management Area	Submitted to EPA <b>Approval Pending</b>	May 2, 2012
NTC Removal Action Completion Report for Residential Properties in OU-1/OU-2	Submitted to EPA <b>Comments Received</b>	July 31, 2012 May 16, 2013
OU-4 Sediment Stability Technical Memorandum	Submitted to EPA <b>Approval Pending</b>	June 30, 2010
Streamlined Ecological Risk Assessment for the OU-1/OU-2 Portion of Snow Creek	Submitted to EPA <b>Comments Received</b> <b>Revision Submitted</b> <b>Approval Pending</b>	February 12, 2013 April 23, 2013 June 5, 2013
Remedial Investigation Report for OU-1/OU-2	Submitted to EPA <b>Comments Received</b> <b>Revision Submitted</b> <b>Approval Pending</b>	February 18, 2013 May 20, 2013 June 27, 2013
Technical Memorandum OU-1/OU-2 Data Gaps (Temporary Well T-11)	Submitted to EPA <b>Approval Pending</b>	February 18, 2013
July 2013 Progress Report	Submitted to EPA	August 9, 2013
Summary Report for the Abandonment of Temporary Wells - Operable Unit 1/Operable Unit 2 and Operable Unit 4	Submitted to EPA	August 13, 2013

**Work Plans**

NTC Removal Action Amended Supplemental Sampling and Analysis Plan, Rev. 1	Submitted to EPA <b>Comments Received</b> <b>Response Submitted</b> <b>Approval Pending</b>	April 26, 2011 May 16, 2013 June 28, 2013
Alternative Removal Action Workplan For the 510 Legrande Street and 0 and 505 Ashley Street Properties	Submitted to EPA <b>Approval Pending</b>	July 3, 2013
Former Holiday Inn Redevelopment Support Work Plan	Submitted to EPA <b>Approval Received</b>	August 8, 2013 August 16, 2013

**Notes:**

<sup>(1)</sup> The approval is pending the completion of the Remedial Investigation/Feasibility Study process for OU-1/OU-2.

TABLE 2

**OU-1 RESIDENTIAL PROGRAM SUMMARY**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Residential Surface Sampling Program (Evaluation Areas 1-35) <sup>(1)</sup></b>	<b>August 2013</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties surface sampled	0
No. of properties where validated analytical results were received	0
No. of properties with validated PCB surface results $\geq$ 1 ppm	0
<b>Total no. of properties with PCB surface results <math>\geq</math> 1 ppm <sup>(2)(3)</sup></b>	<b>17</b>
<b>Total no. of properties with PCB surface results &lt; 1 ppm <sup>(4)</sup></b>	<b>1232</b>

<b>Residential Removal Action Program (Evaluation Areas 1-35) <sup>(1)</sup></b>	<b>August 2013</b>
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>24</b>
<b>Total no. of removal action properties where removals have been completed by Solutia (Additional Unsuitable Areas Remain)</b>	<b>11</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD) <sup>(3)(4)(5)</sup></b>	<b>366</b>
<b>Total no. of &gt; 1 ppm PCBs removal action properties completed by EPA (confirmed) <sup>(6)</sup></b>	<b>8</b>

<b>Residential Surface Sampling Program (Special Use Properties - Evaluation Areas 1-35)</b>	<b>August 2013</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties surface sampled	0
No. of properties where validated analytical results were received	0
No. of properties with validated PCB surface results $\geq$ 1 ppm in High Activity Areas	0
<b>Total no. of properties with PCB surface results <math>\geq</math> 1 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of properties with PCB surface results &lt; 1 ppm in High Activity Areas</b>	<b>24</b>

<b>Residential Removal Action Program (Special Use Properties - Evaluation Areas 1-35)</b>	<b>August 2013</b>
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, and/or confirmatory samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>9</b>

**TABLE 2**  
**OU-1 RESIDENTIAL PROGRAM SUMMARY**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>Residential Removal Action Program (Lead Site AOC Zone A)</b>	<b>August 2013</b>
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>	<b>440</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>	<b>2</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>78</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>3</b>
<hr/>	
<b>Residential Removal Action Program (Lead Site AOC Zone B)</b>	<b>August 2013</b>
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties transferred from the Foothills Community Partnership and/or EPA	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of properties with PCB surface results &lt; 1 ppm sampled by Solutia and/or EPA</b>	<b>525</b>
<b>Total no. of properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm</b>	<b>3</b>
<b>Total no. of Special Use properties with PCB surface results ≥ 1 ppm and Lead &lt;400 ppm in High Activity Areas</b>	<b>0</b>
<b>Total no. of removal action properties completed by Solutia (as part of AOC and CD)</b>	<b>113</b>
<b>Total no. of removal action properties Unsuitable for Removal</b>	<b>6</b>

**Notes:**

- <sup>(1)</sup> Evaluation Areas 1 through 34 also represents the Lead Site AOC Zones C and D.
- <sup>(2)</sup> Includes properties surface sampled by EPA. Does not include completed removal properties or EPA Lead Site Appendix 6 properties.
- <sup>(3)</sup> This total includes three properties where removals have previously been completed, but additional removals are required in the footprint of former structures.
- <sup>(4)</sup> This total has been updated to reflect the property at 601 Zinn Parkway (Parcel 2853) that was inadvertently removed with the adjacent property.
- <sup>(5)</sup> This total includes 3 Appendix 6 properties within Evaluations Areas 1-35 where removals were completed by Solutia.
- <sup>(6)</sup> This total has been updated to include a property where a removal action was completed by the EPA that contains > 1 ppm PCBs by grab sampling.

TABLE 3

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS FOR SURFACE COMPOSITE  
SAMPLES IN EVALUATION AREAS 1-35  
ANNISTON PCB SITE  
Anniston, Alabama**

ADDRESS	EVALUATION AREA	GIS PARCEL ID	PROPERTY STATUS
<b>Residential Program</b>			
1010 Pipe Street	16	1853	Non-Responsive
807 Bancroft Avenue	34	2443	Non-Responsive
918 McDaniel Avenue	11	2217	Non-Responsive
703 Pine Street <sup>(2)</sup>	3	2664	Non-Responsive
510 Legrande Street	13	3070	On Hold
Ashley Street (11-22-01-12-03-1-36)	13	3109	On Hold
631 Roxie Avenue	9	7717	Owner Declined Access During Removal Initiation
916 McDaniel Avenue	11	2254	Owner Declined Access During Removal Initiation
1627 W. 13th Street	21	1061	Owner Declined Removal Access
2106 W. 10th Street	15	2128	Owner Declined Removal Access
1204 Ferron Street	18	1372	Owner Not Found
402 Hunter Street	31	3542	Owner Not Found
509 W. 13th Street	24	1136	Owner Not Found
716 Montrose Avenue <sup>(2)</sup>	11	2500	Owner Not Found
Duncan Avenue (11-22-01-01-04-2-77) <sup>(1)</sup>	21	973	Owner Not Found
621 Pine Street <sup>(2)</sup>	3	2820	Owner Not Found
822 (&824) Crawford Avenue <sup>(1)</sup>	34	2506	Removal Access Granted, Depth Sampling Pending

## Notes:

<sup>(1)</sup> Portions of property are no longer unsuitable for removal

<sup>(2)</sup> Property requires additional removal at the site of the former structure

**TABLE 4**

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN ZONE A  
ANNISTON PCB SITE  
*Anniston, Alabama***

ADDRESS	GIS PARCEL ID	PROPERTY STATUS	IDENTIFIED BY
Residential Program			
124 W. 18th Street	207123	Owner Declined Access During Removal Initiation	EPA
0 Golden Springs Road	533058	Owner Declined Removal Access	Foothills Community Partnership

TABLE 5

PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs AND LESS THAN 400 PPM LEAD RESULTS  
FOR SURFACE COMPOSITE SAMPLES IN ZONE B  
ANNISTON PCB SITE  
*Anniston, Alabama*

ADDRESS	GIS PARCEL ID	PROPERTY STATUS	IDENTIFIED BY
Residential Program			
318 Glen Addie Avenue	3567	Non-Responsive	Foothills Community Partnership
2705 Wilmer Avenue	204090	Non-Responsive	Foothills Community Partnership
3002 Jefferson Street	3410	Owner Declined Removal Access	Foothills Community Partnership



**TABLE 6**  
**OU-4 RESIDENTIAL PROGRAM SUMMARY**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

<b>OU-4 Residential Surface Sampling Program</b>	<b>August 2013</b>
No. of properties where access has been requested to surface sample	0
No. of properties where total access has been granted to surface sample	0
No. of properties surface sampled	0
No. of properties where validated analytical results were received	0
No. of properties with validated PCB surface results $\geq 1$ ppm	0
<b>Total no. of properties with PCB surface results <math>\geq 1</math> ppm</b>	<b>1</b>
<b>Total no. of properties with PCB surface results <math>&lt; 1</math> ppm</b>	<b>22</b>
<b>OU-4 Residential Removal Action Program</b>	<b>August 2013</b>
No. of properties where access has been requested for removal action activities	0
No. of properties where total access has been granted for removal action activities	0
No. of properties where depth, dust, crawlspace, and/or confirmatory samples were collected	0
No. of properties where validated analytical results were received	0
No. of properties where removal actions have been completed	0
No. of properties where removal actions are in progress	0
<b>Total no. of removal action properties completed by Solutia</b>	<b>11</b>

**TABLE 7**

**PROPERTY STATUS FOR RESIDENTIAL PROPERTIES WITH GREATER THAN 1 PPM PCBs RESULTS FOR SURFACE  
COMPOSITE SAMPLES IN OU-4  
ANNISTON PCB SITE  
*Anniston, Alabama***

ADDRESS	GIS PARCEL ID	PROPERTY STATUS
Residential Program		
0 Howard Drive (07-06-14-0-000-004.00)	600117	Owner Declined Removal Access

**TABLE 8**  
**FORMER HOLIDAY INN PROJECT BORROW SOURCE DATA**  
**ANNISTON PCB SITE**  
Anniston, Alabama

Field Sample ID	Sample Date	Sample Type	Depth Min (feet)	Depth Max (feet)	Total PCB (mg/kg)	Total Lead (mg/kg)
BS-071813-1 0-1'	7/18/2013	Original	0	1	ND	9.8
BS-071813-1 1-2'	7/18/2013	Original	1	2	ND	6.6
BS-071813-2 0-1'	7/18/2013	Original	0	1	ND	9.5
BS-071813-2 1-2'	7/18/2013	Original	1	2	ND	12

**Notes:**

mg/kg - milligrams per kilogram

ND - nondetected

PCB - polychlorinated biphenyl

Four composite samples were collected at a potential borrow source (PPIN 65698) to support construction activities related to the Former Holiday Inn Redevelopment Site.

Total PCB concentrations are determined by USEPA Method 8082.

**TABLE 9**  
**OU-3 CONSENT DECREE SUBMITTAL SCHEDULE**  
**ANNISTON PCB SITE**  
*Anniston, Alabama*

**Administrative Issues**

---

Draft deed notice to be filed with Calhoun County land records with an updated description of Operable Unit 3 <sup>(1)</sup>	Submitted to EPA	April 30, 2013
	<b>Revision Submitted</b> <b>Approval Pending</b>	August 28, 2103
Letter clarifying the Boundary of Operable Unit 3 by omitting the Parcel occupied by the West Anniston Business Center.	Submitted to EPA	June 28, 2013
	<b>Approval Pending</b>	

**Work Plans**

---

Operable Unit 3 Remedial Design Work Plan	Submitted to EPA	April 30, 2013
	<b>Comments Received</b>	July 29, 2013
	<b>Revision Submitted</b>	August 28, 2103
RD Sampling and Analysis / Quality Assurance Project Plan (SA/QAPP) <sup>(2)</sup>	Submitted to EPA	April 30, 2013
	<b>Comments Received</b>	July 29, 2013
	<b>Revision Submitted</b>	August 28, 2103
Draft Institutional Control Implementation and Assurance Plan (ICIAP) <sup>(2)</sup>	Submitted to EPA	April 30, 2013
	<b>Comments Received</b>	July 29, 2013
	<b>Revision Submitted</b>	August 28, 2103
OU-3 RD Health and Safety Plan (HASP)	Submitted to EPA	April 30, 2013

**Notes:**

<sup>(1)</sup> The draft deed notice was submitted with the OU-3 Draft ICIAP, included in the Remedial Design Work Plan

<sup>(2)</sup> Submitted as an Appendix of the OU-3 Remedial Design Work Plan.